

# In The United States District Court For The Middle District Of Pennsylvania

Gantor Brown

v.

Gilelea, et al.,

FILED  
SCRANTON

SEP 26 2018

No. 3:18-cv-1527

PER

DEPUTY CLERK

## Declaration In Support Of Plaintiff's Motion For Appointment Of Counsel

- 1) I am Plaintiff in this case. I make this declaration in support of my motion for this appointment of Counsel.
- 2) The Complaint in this case alleges that the Plaintiff is a homosexual inmate with feminine appearance in which he switch his hips and talk like a girl and wear eyeliner. Plaintiff was admitted into the RHD, with officials already aware he was a vulnerable inmate with a history of getting sexually assaulted. Plaintiff will then be force in a cell with a violent Lifer that he told officials they were engaging in which he was getting extorted in population by the same "Lifer". The Lifer made officials aware he did not want a homosexual or a rat in the cell with him. All this was ignored. Over the next (5) days officials would witness assaults and sexual assaults on Plaintiff, in which they refuse to remove him away from his violent attacker. This would lead to serious injuries that the medical department would also ignore.
- 3) This is a complex case because it contains several different legal claims under the First, Eighth, and Fourteenth Amendment.
- 4) This case involves complex medical issues that may require expert testimony.
- 5) The Plaintiff has demanded a jury trial.
- 6) The case will require discovery of documents and depositions of a number of witnesses.
- 7) The testimony will be in sharp conflict, since the Plaintiff claims happened in a cell off camera in which defendants will most likely claimed having any wrong doing.
- 8) The Plaintiff has a low education level and a hard time with reading.
- 9) The Plaintiff is currently in punitive segregation. For this reason, he has very limited access to legal materials and has no ability to investigate the facts of the case, for example, by locating and interviewing other inmates who were eye witnesses to defendants' actions.
- 10) As set forth in the Memorandum of Law Submitted with this motion, these facts, along with the legal merit of Plaintiff's claims, support the appointment of Counsel to represent the Plaintiff.

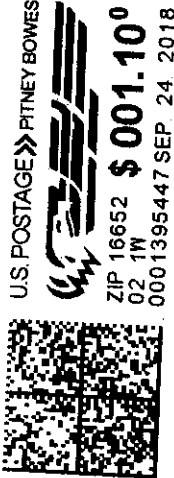
WHEREFORE, the Plaintiff's motion for appointment of Counsel should be granted. Pursuant to 28 USC 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed this 09 day of 12, 2018

Gantor Brown

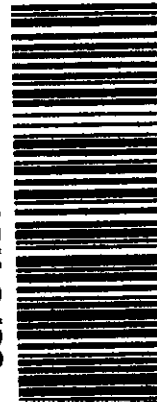
Name Baxter Brown  
Number NA6401  
1100 Pike Street  
Huntingdon, PA 16654-1112

INMATE MAIL  
PA DEPARTMENT  
OF CORRECTIONS



UNITED STATES  
POSTAL SERVICE

USPS TRACKING #



14 9014 9645 1922 5135 25

LAB400R Aug. 2013 7690-17-000-0869

United States District Court  
235 N. Washington Ave  
P.O. Box 1148  
Craiton, P.A. 18501-1148

RECEIVED  
SCRANTON, PA

SEP 26 2018

Pen DERUTY CLERK